

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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In the Matter of

Federal-State Joint Board on  
 Universal Service

CC Docket No. 96-45

Access Reform

CC Docket 96-262

**REPLY COMMENTS OF AMERITECH**

Ameritech submits its Reply Comments in response to the Commission's further notice of proposed rulemaking in the above matter. In the FNPRM, the Commission seeks comment on certain aspects of a possible new mechanism for providing high-cost universal service support to non-rural local exchange carriers ("LECs"). In its Comments, Ameritech proposed that the Commission simply retain the existing high-cost support system, which has a proven track record of efficiently and economically providing the appropriate level of cost support. The comments filed in this proceeding by the other parties provide no rational reason for the Commission to consider adoption of an unproven new mechanism of enormous complexity and size. Moreover, the comments demonstrate beyond a doubt that the parameters of any such new mechanism will be purely arbitrary and designed to achieve a pre-determined fund size.

**1. Ameritech proposes that the Commission retain the existing support mechanism.**

In its Comments, Ameritech demonstrated that the Commission is considering a new support mechanism, even though there is no evidence that the existing system is deficient. In fact, both the Commission and the Joint Board concede that rates today are

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“affordable.” Nor is there any suggestion that rates between urban and rural areas are not “reasonably comparable.”

Because of legitimate concerns about a potential drastic increase in the size of a new fund, and its potential adverse impact on consumers, in the FNPRM the Commission asks about ways to limit the size of the fund. In its Comments, Ameritech pointed out the answer is simple – stay with the existing system, which already successfully minimizes both payments and administrative costs and burdens to the appropriate level required to keep rates affordable.<sup>1</sup> Moreover, despite the Commission’s concerns, there is no reason to believe that states will not modify intrastate support mechanisms, as necessary to respond to increased pressure on the existing implicit subsidies caused by increased competition.

Ameritech pointed out in its Comments that the setting of the parameters of the new mechanism is arbitrary and subject to challenge. As a result, Ameritech proposed that if, in spite of the above, a new mechanism is adopted, its parameters (i.e.: benchmark level, area over which LEC costs are averaged, assumed state support amount) should be set with an eye to producing a reasonable result – a fund size roughly within current parameters. But, on balance, the best course is to simply retain the existing support system, and deal with any requests for additional funding from a state that finds that it can no longer provide adequate intrastate support, if and when it arises.

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<sup>1</sup> In fact, the current support mechanism is already operating to reduce the size of the fund. According to the third quarter 1999 estimate submitted by the Universal Service Administrative Company (“USAC”), non-rural carriers will receive \$210 million in high-cost funding for 1999, a decrease of \$45 million from the 1998 support level of \$255 million.

Since the filing of Ameritech's Comments, the United States Court of Appeals for the Fifth Circuit has issued its decision upholding in part, and reversing in part, the Commission's universal service plan.<sup>2</sup> The uncertainty created by this decision provides an additional compelling reason for retaining the existing mechanism. For instance, in that case, the 5<sup>th</sup> Circuit reversed (slip.op. at 34) the Commission's decision "that includes intrastate revenues in the calculation of the universal service contributions" on jurisdictional grounds. Moreover, the Court also reversed on jurisdictional grounds, (slip.op. at 35) the Commission's finding that it "could refer . . . carriers to the states for recovery of . . . contributions." In light of the severe doubt concerning the Commission's jurisdiction to adopt a mechanism that covers both intrastate and interstate services and revenues, the Commission should decline to adopt any new mechanism achieving that result, or if it rejects Ameritech position recommending retention of the existing system, the Commission should at least limit the new mechanism to interstate services and revenues.

**2. The comments confirm that the current mechanism is adequate and should not be changed.**

The comments filed in this matter confirm the soundness of simply retaining the existing support mechanism, and to responding to any need for additional funding, in the future, if and when that need arises. Most tellingly, no party provides any evidence supporting a claim that current rates for non-rural carriers are unaffordable or not reasonably comparable, or that there is any valid reason to change funding

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<sup>2</sup> Texas Office of Public Utility Counsel v. Federal Communications Commission, No. 97-60421 (5<sup>th</sup> Circuit, 1999).

mechanisms or to increase the size of the fund, at this time. In summary, the current system is not “broken” and need not to be fixed.

**3. The comments demonstrate that proposed parameters for the proposed new support mechanism will be arbitrary and designed to produce a desired result.**

The comments confirm Ameritech’s position that the proposed funding mechanism will be based upon subjective parameters. The proposals for the parameters of the new mechanism cover the entire range of logical possibilities, with each party proposing ones that fit its particular needs and circumstances. However, what these proposals confirm is that each parameter is truly arbitrary, and that there is no consensus upon which to build. Based upon the record, the Commission has no objective basis for selecting parameters for the new mechanism.

For example, various parties have suggested different benchmarks and/or different levels of “state responsibility.” When taken together, they yield a predetermined fund size (either “large” or “small”). However, no compelling logic is presented for any of these proposals, except that they produce a desired outcome. The following is only a sample of the range of proposals thrown at the Commission.

1. **AT&T** proposes a 200% benchmark and a high state responsibility (pp. 8-10. “The Commission should set the cost benchmark and the revenue per-line parameters to yield a federal fund approximately the size of the current explicit federal high cost support mechanism.”
2. **Sprint** suggests that the benchmark should be 150% but that only 37.5% of the costs exceeding the benchmark should be eligible for funding. States should be responsible for \$1.00 in support per line per month. (pp. 14-18)
3. **BellSouth** suggests that varying the benchmark is an administratively easy way for the Commission to adjust the fund size regardless of the level of aggregation. (i.e. if costs are computed at the study area level, then you could have a lower

benchmark. If costs are computed at the UNE zone or wire center level, then raising the benchmark will limit the size of the fund) (pp. 6-8).

4. **US West** apparently wants a large fund and suggests that the benchmark be no higher than 115% and that support be calculated at the smallest practical geographic area ("grids") which are smaller than wire centers. (pp. 9-13)
5. **West Virginia Consumer Advocate** says that the benchmark should be 135% (halfway between 115% and 150% which is the range suggested by the Joint Board) and that state support should be \$2 per line per month. (p. 3)
6. **ITCs** says that the benchmark should be set at 100% but that 115% is acceptable for non-rural carriers. (p. 3-4)
7. **Western Wireless** suggests that the benchmark be set no lower than 150% and that the following table should be used to determine support:

<u>Cost per line (relative to national average)</u>	<u>Support provided</u>
Less than 150%	0
150%-200%	25%
200%-300%	50%
300%-500%	75%
Above 500%	100%

Moreover, Bell Atlantic correctly points out that the cost model itself is flawed, and that the results of the model make no sense.<sup>3</sup>

As MCI points out, the variables only "merit" is that their values can be manipulated to yield an estimated "need" for whatever level of funding is being sought.<sup>4</sup> Under the circumstances, all the Commission should do is recognize that the parameters of the proposed new mechanism are essentially arbitrary, and adopt ones that produce a fund that provides the appropriate level of funding over time. However, the better course is to simply retain the existing mechanism.

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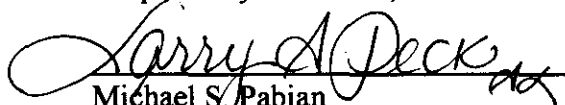
<sup>3</sup> Bell Atlantic, p. 4 and Exhibit 1.

<sup>4</sup> MCI Comments, pp. 3-6, 9-10.

**4. Conclusion.**

For the above reasons, Ameritech reiterates its proposal that the Commission retain the current mechanism for non-rural carriers. Since the Commission and the industry already know that the current fund size is adequate, and that it is an efficient and cost-effective mechanism for collection and distribution of high-cost support, it makes no sense to devise a new system that at best would achieve the same outcome.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry A. Peck", with a horizontal line drawn through the middle of the signature.

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Dated: August 6, 1999

[Larry/lap0335Unvsl Supp Reply]

### CERTIFICATE OF SERVICE

I, Grace Germain, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties of record, via first class mail, postage prepaid, on this 6<sup>th</sup> day of August, 1999

  
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